

## REMARKS

Claims 1-20 are pending. Reconsideration of the Claims is respectfully requested.

### 102 Rejection

Claims 1-3 and 7-19 are rejected under 35 U.S.C. § 102(a) as being anticipated by Chujoh et al. (US Patent Application No. 20010017933 A1). Applicants respectfully submit that the Chujoh et al. reference does not anticipate or render obvious the embodiments of the present invention as are set forth in Claims 1-14.

The Examiner is respectfully directed to Claim 1 which is drawn to a traffic communication system that includes a traffic control device. Claim 1 is reproduced below in its entirety for the convenience of the Examiner:

1. A traffic communication system wherein a traffic control device comprises:

a first traffic management module, for determining a first system variable wherein said first system variable comprises express traffic management information;

a first encoder communicatively coupled to said first traffic management module, for encoding said first system variable as a first signal according to a protocol; and

first transmitter communicatively coupled to said first encoder, for optically transmitting said first signal.

Claims 10 and 15 recite limitations similar to those contained in Claim 1. Claims 2,



3 and 7-9 depend from independent Claim 1, Claims 11-14 depends from independent Claim 10, and Claims 16-19 depend from independent Claim 15 and set forth additional limitations of embodiments of the present claimed invention.

Chujoh et al. does not anticipate or render obvious a traffic communication system that includes “a first traffic management module, for determining a first system variable, wherein said first system variable comprises express traffic management information” as is recited in Claim 1 (Claims 10 and 15 contain similar limitations). Chujoh et al. only shows a traffic density analysis system that bases its analyses on received encoded video. More specifically, Chujoh et al. discloses a monitor camera that monitors traffic and takes photographs that are transmitted as encoded video for traffic density analysis. In the Office Action the monitor camera, e.g., 1 in Figure 2, is equated to the recited traffic management module and, the encoded signals from which the photographs are produced are equated to the recited first system variable.

Applicants respectfully submit that the equating of these elements is improper as the encoded signals disclosed by Chujoh et al. represent photographic content that has yet to be analyzed while the recited first system variable represents express traffic management information that is provided by the traffic management module (e.g., results of an analysis performed by the traffic management module). Consequently, the recited system variable is the result of traffic analyses that is already performed by the traffic management module that can be sent to various locations as express traffic management information ready to be used. This is contrasted with the photographs of Chujoh et al. that must be subjected to analysis before results are determined. As such, the encoded signals disclosed in Chujoh et al. are substantially different from the system variable that is recited in Applicants’ Claim 1 (Claims 10 and 15 contain similar limitations).



Moreover, nowhere in the Chujoh et al. reference is a traffic communication system that includes a first traffic management module, for determining a first system variable, wherein the first system variable comprises express traffic management information taught or suggested as is recited in Claim 1 (claims 10 and 15 contain similar limitations). Consequently, the embodiments of Applicants invention as are set forth in Claims 1, 10 and 15 are neither anticipated nor rendered obvious.

Accordingly, Applicants respectfully submit that White does not anticipate or render obvious the embodiments of the present claimed invention as are recited in Claims 2, 3 and 7-9 which depend from Claim 1, Claims 11-14 which depend from Claim 10 and Claims 16-19 which depend from Claim 15. Applicants respectfully submit that these Claims are allowable as they depend from allowable base claims.

Claims 4 and 5 are rejected under 35 U.S.C. 103(a) as being unpatentable over Chujoh et al. in view of Garnache et al. Garnache et al. does not teach or suggest a modification of Chujoh et al. that would remedy the deficiencies of Chujoh et al. outlined above. More specifically, Garnache et al. does not teach or suggest a traffic communication system that includes “a first traffic management module, for determining a first system variable, wherein said first system variable comprises express traffic management information” as is recited in Claim 1 (Claims 4 and 5 depend from Claim 1). Garnache et al. only discloses an optical transmitter comprising a stepwise tunable laser. Importantly, Garnache et al. does not address, and thus does not remedy, the deficiencies of Chujoh et al. that are outlined above pertaining to a traffic communication system that includes a first traffic management module, for determining a first system variable, wherein the first system variable comprises express traffic management information. Consequently, Chujoh et al. either alone or in combination with Garnache et al. does not anticipate or render



obvious the embodiments of the present invention as are set forth in Claims 4 and 5 (which depends from Claim 1).

Claim 6 is rejected under 35 U.S.C. 103(a) as being unpatentable over Chujoh et al. in view of Kuhara et al. Kuhara et al. does not teach or suggest a modification of Chujoh et al. that would remedy the deficiencies of Chujoh et al. outlined above. More specifically, Kuhara et al. does not teach or suggest a traffic communication system that includes “a first traffic management module, for determining a first system variable, wherein said first system variable comprises express traffic management information” as is recited in Claim 1 (Claim 6 depends from Claim 1). Kuhara et al. only discloses an optical transmitter and optical connector. Importantly, Kuhara et al. does not address, and thus does not remedy, the deficiencies of Chujoh et al. that are outlined above pertaining to a traffic communication system that includes a first traffic management module, for determining a first system variable, wherein the first system variable comprises express traffic management information. Consequently, Chujoh et al. either alone or in combination with Kuhara et al. does not anticipate or render obvious the embodiments of the present invention as are set forth in Claim 6 (which depends from Claim 1).



Conclusion


In light of the above-listed amendments and remarks, Applicants respectfully request allowance of the remaining Claims.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

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Respectfully submitted,

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